

EXHIBIT

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CHARLOTTE CHARLES, *et al.*,

Plaintiffs,

v.

ANNE SACOOLAS and JONATHAN
SACOOLAS,

Defendants.

Civil Action No. 20-1052-TSE

UNITED STATES' MOTION FOR PROTECTIVE ORDER

Pursuant to 28 U.S.C. § 517 and Federal Rule of Civil Procedure 26(c), the United States, through undersigned counsel, hereby respectfully moves for the entry of a protective order as to discovery or disclosure of information in this litigation implicating the United States Government that is in any way, either directly or indirectly, related to the Defendants' or any other individuals' employment with the United States Government. The grounds for this motion are explained in the simultaneously-filed memorandum of law in support of the motion.

Undersigned counsel certifies that, as discussed in greater detail in the United States' supporting memorandum of law, he has conferred with counsel for the parties regarding this motion. Defendants consent to the relief sought in this motion and Plaintiffs oppose.

Dated: July 23, 2021

Respectfully submitted,

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ATTORNEYS FOR THE UNITED STATES

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[DRAFT] ORDER GRANTING PROTECTIVE ORDER

This matter comes before the Court on the United States' Statement of Interest and Motion for Protective Order. Upon consideration of the United States' submissions, including its filing submitted *ex parte* and *in camera*, as well as Plaintiffs' response thereto, and good cause having been shown to support the relief requested by the United States, it is hereby

ORDERED that the United States' motion is **GRANTED**; it is further

ORDERED that, pursuant to Fed. R. Civ. P. 26(c), the parties shall not elicit any information during the litigation of the above-captioned action implicating the United States Government that is in any way, either directly or indirectly, related to the Defendants' or any other individuals' employment with the United States Government. This prohibition also applies to preclude any party or third-party from having to disclose such information for any purpose in this litigation; and it is further

ORDERED that any dispute concerning the application of the above prohibition, if not resolved by the parties through the meet and confer process, shall be presented to the presiding United States District Judge through a written motion.

SO ORDERED.

Dated: _____

T.S. Ellis, III
United States District Judge